

JAMES HAWKINS APLC

James R. Hawkins (SBN 192925)
James@jameshawkinsaplc.com
Christina M. Lucio (SBN 253677)
Christina@jameshawkinsaplc.com
Mitchell J. Murray (SBN 285691)
mitchell@jameshawkinsaplc.com
9880 Research Drive, Suite 200
Irvine, California 92618
Telephone: (949) 387-7200
Facsimile: (949) 387-6676

Attorneys for Plaintiff JOE VIGIL,
on behalf of himself and all others similarly situated

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JOE VIGIL, individually and on behalf
of all others similarly situated,

Plaintiff,

vs.

HYATT CORPORATION, a Delaware
corporation, GRAND HYATT S.F.,
LLC, a Delaware limited liability
company, doing business as GRAND
HYATT SAN FRANCISCO, and DOES
1-50, inclusive,

Defendants.

Case No. 4:22-cv-00693-HSG
Judge: Haywood S. Gilliam, Jr.

**DECLARATION OF PLAINTIFF
JOE VIGIL IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: August 24, 2023
Time: 2:00 p.m.
Courtroom 2

Action Filed: November 2, 2021

DECLARATION OF JOE VIGIL

I, Joe Vigil, declare as follows:

1. I am an individual over 18 years of age and a resident of California. I am the named Plaintiff in this matter. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I was employed by Hyatt at the Grand Hyatt San Francisco from approximately February 2001 to November 2020 as a non-exempt employee. I worked for Hyatt at their San Francisco location as a Security Officer.

3. While I worked for Hyatt, I suffered the harm and unlawful actions that are alleged in the operative complaint and brought this case against Defendants Hyatt Corporation and Grand Hyatt S.F., LLC on behalf of myself and others who also were impacted by Hyatt's unlawful practices at the Grand Hyatt San Francisco.

4. Throughout the pendency of this lawsuit, I have assisted my attorneys. This included meeting and conferring with my attorneys on numerous occasions, identifying witnesses, providing information regarding the working conditions at the hotel, providing my attorneys with documents and information, reviewing the complaints for the class action and the private attorney general action, reviewing documents regarding policies and procedures, preparing for mediation, remaining available and participating during mediation and in the subsequent negotiations and discussion, reviewing and discussing the terms of the Settlement Agreement, and assisting with the approval documents by offering declarations and relevant facts.

5. I understand that the class claims alleged in this action were brought on behalf of other similarly situated employees, and thus I am acting as a representative for the Class. As the class representative, I understand that it is my responsibility to act in the Class's best interest. I am not aware of any conflicts

1 that exist between my interest and the interests of the Class that would impair or
2 affect my ability to serve as representative for the Class.

3 6. I believe that I was subjected to the same policies, procedures,
4 Human Resources, and payroll practices as the other employees working at the
5 Grand Hyatt San Francisco during the relevant time period. I believe that my
6 experiences related to timekeeping, wage payments, record keeping, wage
7 statements, Covid-19 screenings, meal periods, rest periods, reimbursements, and
8 related to sick leave are typical of the Class that I seek to represent.

9 7. I understand that approximately 527 current and former employees of
10 Defendant will be eligible to participate in the settlement and receive a settlement
11 payment.

12 8. I have and continue to be willing to assist in the investigation of this
13 matter, as well as make myself available for trial or any further proceeding in this
14 matter as required to represent the interests of the Class. I also understand my
15 duties and responsibilities to the Class and will carry out those duties as
16 necessary.

17 9. Throughout this case, I have continuously been kept apprised of the
18 status of this case.

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

Executed on this 18 day of May/2023, at San Francisco,
California.

DocuSigned by:

769B33C3E399480...

Joe Vigil